

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

VINEYARD VINES, LLC,)	
)	
Plaintiff,)	
)	C.A. No. 15-587-GMS
v.)	
)	JURY TRIAL DEMANDED
REHOBOTH LIFESTYLE CLOTHING)	
CO., AND SHORE TRANSFERS,)	
)	
<u>Defendants.</u>)	

**CONSENT JUDGMENT AND PERMANENT INJUNCTION
(DEFENDANT RLCC)**

WHEREAS Plaintiff Vineyard Vines, LLC (“Vineyard Vines”) has filed this action against Defendants for, *inter alia*, violations of the Lanham Act, 15 U.S.C. §§ 1051 *et seq.*, and common law unfair competition;

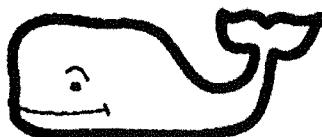
WHEREAS Defendant Rehoboth Lifestyle Clothing Co. (“RLCC”), a sole proprietorship owned by Prem Chatani, and Prem Chatani individually having entered into a settlement agreement with Vineyard Vines and having stipulated, without any admission of liability, to entry of a permanent injunction; and

WHEREAS, Vineyard Vines and RLCC, having indicated below their consent to the form and entry of this *Consent Judgment and Permanent Injunction* as to Defendant RLCC;

IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

1. That Defendant, RLCC, its members, owners, officers, agents, servants, employees and attorneys, and those in active concert or participation with it, who receive actual notice hereof, be and hereby are permanently ENJOINED from:

- a. Using the Vineyard Vines Whale Design trademark shown below,



using any of the whale designations shown on the goods in Exhibit A hereto, and using any other colorable imitations of the Vineyard Vines Whale Design trademark in connection with the manufacturing, packaging, labeling, importation, exportation, advertising, promoting, marketing, offering, selling or distribution of clothing goods, heat transfer decals, and any other goods in the United States.

b. Engaging in any other activity that constitutes an infringement or dilution of the Vineyard Vines Whale Design trademark or Vineyard Vines' exclusive ability to use or exploit its mark;

c. Assisting, aiding, or abetting any other person or business entity in engaging in or in performing any of the activities referred to in subparagraphs a and b above.

IT IS FURTHER ORDERED that the claims asserted against Defendant RLCC in this lawsuit are hereby dismissed with prejudice and with the consent of Plaintiff.

IT IS STILL FURTHER ORDERED, HOWEVER, that this Court has jurisdiction over Vineyard Vines, RLCC, and the subject matter of the action. This Court shall retain jurisdiction to the extent necessary to enforce this permanent injunction and the settlement agreement between Vineyard Vines and RLCC, and to determine any issues that may arise under either.

**CONSENTED TO BY VINEYARD
VINES, LLC**

Dated: February 1, 2016

By:

M. J.
President

**CONSENTED TO BY REHOBOTH
LIFESTYLE CLOTHING CO.**

Dated: January 29th, 2016

By:

Prem Chatani
Prem Chatani, Sole Proprietor

SO ORDERED this _____ day of _____ 2016.

UNITED STATES DISTRICT JUDGE